

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

LUKE T. CHRISMAN,

Plaintiff,

v.

LLOYD J. AUSTIN, III,

United States Secretary of Defense, *et al.*,

Defendants.

No. 6:22-cv-0049-H

**DEFENDANTS' FIRST SET OF
REQUESTS FOR PRODUCTION TO PLAINTIFFS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendants, by and through their undersigned counsel, hereby respectfully submit their first set of requests for production.

INSTRUCTIONS

For purposes of these interrogatories, the following definitions apply:

1. When asked to produce a document, the request is for information within your actual or constructive possession, custody or control. Your answers must therefore include not only information available to you, but also that is available to your attorneys, associates, employees, representatives, agents, and all other persons acting under, by, or through you, or subject to your control or supervision, or acting on your behalf.
2. To the extent a document is not produced because of an assertion of privilege, please state the specific privilege relied upon and support the claim of privilege with sufficient information to enable Defendants and the Court to assess the validity of that assertion consistent with Federal Rule of Civil Procedure 26. If you object to producing only part of a requested document, please produce that portion of the document you do not object to producing and indicate what portion you have withheld based on an assertion of privilege.
3. These requests do not seek information the revelation of which would violate the attorney-client privilege. Please redact any personally identifiable information of Plaintiffs.
4. Unless specified otherwise in a specific request the time period for these requests is January 1, 2019 to present.
5. Please provide the requested documents to undersigned counsel no later than thirty (30) days from date of service or at another reasonable time specified in the response.

DEFINITIONS

For purposes of these interrogatories, the following definitions apply:

1. **“Document”** means the original and any draft or copy of any written, recorded or graphic materials of any type and in any form (including those maintained in electronic form, including on any social media accounts) in your possession, custody, knowledge, or control, including your attorneys, agents, and representatives.
2. **“Interrogatory”** or **“interrogatories”** refers to Defendants’ interrogatories to Plaintiffs in the above-captioned case, including those served concurrently with any requests for production.
3. **“Firms”** includes any and all law firms retained to represent Plaintiffs in this lawsuit, including Siri & Glimstad LLP, Christ Wiest Law PLLC, Bruns, Connell, Vollmar & Armstrong LLC, and S&L Law PLLC.
4. **“Plaintiffs”** shall mean Robert Schelske, Huntley W. Bakich, Zakai Bukfin, Samuel L. Conklin, Joshua J. Costroff, Samuel Galloway, Dominic O. Mell, Collin M. Morrison, Nicholas Saballa, Peter Testa, and Luke T. Chrisman.
5. **“Litigation matter”** shall mean any case brought before a court, board, commission, or tribunal in any federal, state, or international jurisdiction, including but not limited to any military board of corrections or any court, board, commission, or tribunal governed by the Uniform Code of Military Justice.
6. **“Attorney”** shall mean any individual who is employed in the practice of law and is licensed to practice law in any state, and who submitted a request for fees in the above-captioned case.
7. **“Time”** shall mean any amount of hours or increments of hours spent working on a litigation matter.
8. **“Recompense”** shall mean any monetary charges arising out of an Attorney’s representation of a client in a litigation matter.
9. **“Billing rate”** shall mean the hourly rate that a Firm or an Attorney charged to a client if billed by the hour; or the flat rate that a Firm or an Attorney charged to a client if billed by a flat fee; or the alternative rate that a Firm or an Attorney charged to a client if billed by an alternative rate.
10. **“And”** and **“or”** shall be construed conjunctively and disjunctively.
11. **“Each”** means each and every.

12. The singular form of any word shall also be construed as the plural, and vice versa. Verbs shall be construed as though they were in the past tense, the present and the future tense, and vice versa. In general, the interrogatories should be construed as broadly as possible.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce all documents identified in response to Defendants' interrogatories in this action.

REQUEST FOR PRODUCTION NO. 2:

Please produce all retainer agreements executed with a client regarding representation in any case identified in Interrogatory No. 1.

REQUEST FOR PRODUCTION NO. 3:

Please produce all retainer agreements executed with Plaintiffs regarding representation in the above-captioned case.

Dated: January 26, 2024

Respectfully submitted,

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